

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF MICHIGAN

In re: DAVID E. COSSOU and
PAULA S. COSSOU,
Debtors.

Case No. 16-04484-swd
Chapter 13

DEBTORS' FIRST MOTION TO MODIFY THE CONFIRMED CHAPTER 13 PLAN

The Debtors, by and through their attorneys, Andersen Ellis & Shephard, hereby ask the Court to modify the confirmed Chapter 13 plan pursuant to 11 U.S.C. §1329(a).

1. This case was filed on August 30, 2016. The plan was confirmed on December 15, 2016. This case has never been converted, dismissed, or reinstated.
2. The Debtors ask the Court to modify the plan as follows:

- A. ¶ III.C.1.e Wholly Unsecured Liens of the Plan filed on September 13, 2016 is amended to add

Property address	Creditor	Claim amount	Property value	Senior lien amount
412 E. Montcalm Greenville MI 48838	US Department of Housing and Urban Development	\$27,081.16	\$73,000.00	\$102,198.98

Upon completion of the plan the lien shall be discharged and removed from the property. The Debtors may move under Fed. R. Bankr. P. 7070, on notice to the holder of such a claim who refuses to release the lien, for an order declaring the lien released and for related relief.

- B. In all other respects the plan remains the same.

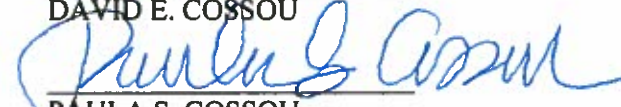
3. Statement in Support of Motion: This modification is necessary because this provision was inadvertently omitted from the original chapter 13 plan. This claim is already being treated as unsecured by the confirmed plan since there is no equity in the property to secure the claim.

The Debtors therefore ask the Court to modify the confirmed chapter 13 plan accordingly.

Date: 1-15-18

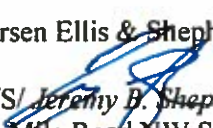

DAVID E. COSSOU

Date: 1/15/18


PAULA S. COSSOU

Andersen Ellis & Shephard

Date: 1-22-2018

By: /s/  Jeremy B. Shephard (P72719)
866 3 Mile Road NW Suite B
Grand Rapids, MI 49544
(616) 784-1700